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18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**

20 **CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION**

21  
22 ALEX MORGAN, et al.,

23 Plaintiffs/Claimants,

24 v.

25 UNITED STATES SOCCER  
26 FEDERATION, INC.,

27 Defendant/Respondent.  
28

**Case No. 2:19-cv-01717-RGK-AGR**

Assigned to: Judge R. Gary Klausner

**DECLARATION OF CARLI LLOYD IN  
SUPPORT OF PLAINTIFFS' REPLY IN  
SUPPORT OF MOTION FOR CLASS  
CERTIFICATION**

Date: October 21, 2019

Time: 9:00 A.M.

Place: Courtroom 850

1 I, Carli Lloyd, declare as follows:

2 1. I am over the age of 18. If called upon to testify, I could and would  
3 competently testify to the matters set forth in this declaration.

4 2. I have been a member of the WNT continuously since 2005.

5 3. The WNT players have played more games on an inferior surface of play,  
6 artificial turf, than the MNT players. For example, from January 1, 2014 through  
7 December 31, 2017, the WNT players played 62 domestic games, including games for  
8 the World Cup and Olympic qualifiers. 13 of the 62 games (about 21%) were played on  
9 artificial turf. For only 1 game was natural grass temporarily installed over a venue  
10 with artificial turf. Over the same time period, the MNT played 32 domestic matches,  
11 with 0 on artificial turf and 7 where natural grass was installed over a venue with  
12 artificial turf.

13 4. I currently play for the Sky Blue FC in the National Women's Soccer  
14 League ("NWSL"). In 2017, I played for Manchester City in the FA Women's Super  
15 League. My employment with any domestic or foreign professional team is a separate  
16 job from my national team employment with the USSF. This is the same for any WNT  
17 player.

18  
19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed on this 5th day of October, 2019.

21  
22   
23   
24 \_\_\_\_\_  
25 Carli Lloyd  
26  
27  
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